

European e-invoicing and e-reporting overview

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Austria (contact: Günther Platzer; guenther.platzer@icon.at)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. eMail, EDI, invoice is provided with a qualified electronic signature/seal)
 - › mandatory for B2G (via the Austrian business service portal USP E-Rechnung.gv.at or PEP-POL)

E-Invoicing *in the future*

- › Currently extensive discussions, no changes planned

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list

Digital reporting *in the future*

- › Currently extensive discussions, no changes planned



Belgium (contact: Gert Vranckx; gert.vranckx@tiberghien.com)

E-Invoicing *today*

- › Paper or (non-structured) electronic invoice: default rule for any type of transaction.
- › e-Invoice:
 - › Voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format)
 - › Mandatory for B2G (public contracts)

E-Invoicing *in the future*

- › Issuing e-invoices for B2B transactions will be mandatory from 1 January 2026.
- › e-Invoice: Obligation for B2B transactions when issuer is established in Belgium and customer (established or not) is obliged to communicate his Belgian VAT number. VAT-exempt transactions (Art. 132 EU VAT Directive) are excluded.
- › Format: PEPPOL-BIS, parties may agree on another format if they correspond with the EN 16931 requirements.

Digital reporting *today*

- › No periodical reporting obligation of transaction data to tax authorities besides VAT return, EC-sales list and Annual Sales Listing.

Digital reporting *in the future*

- › Although the explanatory memorandum to the law introducing the e-Invoicing obligation refers to the crucial step of adopting e-Invoicing in the implementation of digital reporting, specific digital reporting obligations of transaction data are yet to be announced.



E-Invoicing *today*

- › Right to choose between paper invoice and electronic invoice.
- › Electronic invoice:
 - › Not mandatory for B2B or B2C supplies;
 - › Electronic invoicing must be explicitly or tacitly accepted by the customer;
 - › Any business controls creating a reliable audit trail are acceptable, qualified electronic signature and EDI are mentioned as one of the example technologies.

E-Invoicing *in the future*

- › In 2021 the transition to electronic invoicing was put up for discussion by the Bulgarian tax authorities to the business but the project never came to fruition.
- › Currently there is no draft legislation on e-invoicing.

Digital reporting *today*

- › Monthly VAT returns are filed together with VAT listings of all input and output supplies through the monthly period reported on a transactional basis. The VAT listings contain invoice number, date, the name and VAT number of the issuer/customer, a description of the supply and its tax treatment.
- › VAT returns, VIES and Intrastat returns are filed only electronically by registered persons.

Digital reporting *in the future*

- › A pilot project for SAF-T reporting is currently under way although there is no specific time schedule for its implementation. When implemented, SAF-T reporting will be first applied by large taxpayers and will then gradually encompass all taxpayers.
- › Currently there is no draft legislation on SAF-T or digital reporting.



Croatia (contact: Nika Miloloža; nika.miloloza@tpprime.hr)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer)
 - › mandatory for B2G
 - › the European Standard on eInvoicing (EN) is fully implemented in Croatia
 - › the Croatian government recommends the use of the OASIS UBL 2.1 syntax for B2G public procurement (the Cross-Industry Invoice (CII) is accepted as an alternative)
 - › since 2019, all state beneficiaries receive and send e-invoices through PEPPOL Network (sending e-invoices via Peppol network is in compliance with the European standard on eInvoicing (EN 16931) and PEPPOL BIS Billing 3.0 specification)

E-Invoicing *in the future*

- › Mandatory for B2B transactions as of 2025 when parties resident in Croatia
- › Reporting directly to the Croatian Tax Administration regarding the B2G segment
- › Integrated e-archive service

Digital reporting *today*

- › The communication with the Croatian Tax Administration is in general done electronically using the e-Porezna (*e-Tax Administration*) online portal
- › VAT return, EC Sales List, EC Acquisition List, Register of Purchase Invoices and Intrastat are submitted electronically

Digital reporting *in the future*

- › *Project Fiscalization 2.0* includes the implementation of real-time VAT reporting feature, and accessible and simple online accounting



E-Invoicing *today*

- › E-invoicing mandatory for B2G transactions

Digital reporting *today*

- › Requirement of tax audit reporting via the SAF-T-format
- › Currently no CTC clearance model for compliance with the ViDA Directive

E-Invoicing *in the future*

- › E-invoicing will become mandatory for B2B transactions from 1 July 2024 (standard bookkeeping systems and specially made bookkeeping systems)
- › In 2026, E-invoicing will become mandatory for personally owned businesses, where the commercial net turnover in each of the two latest fiscal years (2024 and 2025) exceeded 300,000 DKK

Digital reporting *in the future*

- › Models for VAT clearance are being explored



E-Invoicing *today*

- › Since 1 April 2020, all companies and public organizations can request an electronic invoice from their suppliers. Exceptions: Not applicable when turnover is less than 10.000 euros or the company conducts B2C business only.
- › The State of Finland receives e-invoices only.
- › Accepted formats: TEAPPSXML3.0, Finvoice 3.0, UBL, CII
- › The Finnish Information Society Development Centre (TIEKE) maintains a registry of companies that have implemented e-invoicing.

E-Invoicing *in the future*

- › The Finnish national legislation is expected to be amended on the basis of the ViDA Directive.

Digital reporting *today*

- › Current VAT return in Finland is narrow in content and does not provide a clear picture of the company's operations.
- › Electronic filing of VAT return preferably via MyTax, which is the electronic portal of the Finnish Tax Administration.
- › Filing on paper is allowed only in exceptional cases.

Digital reporting *in the future*

- › Intended to enter in to force 2028 (intended alignment with ViDA dates)
- › The Finnish Tax Administration is a participant in a project called "Real-Time Economy Project". This project aims to build a national digital ecosystem for enterprises compatible with similar systems in other Nordic countries. The ecosystem would allow seamless, real-time and secure transmission of orders, e-invoices, digital sales receipts and business information between corporations of all sizes. No timeline for this so far.



France (contact: Florent Josseaume; florent.Josseaume@fidal.com)

E-Invoicing *today*

- › E-Invoicing mandatory for B2G transactions since January 2017
- › E-invoicing voluntary for B2B (only upon acceptance by customer, no mandatory format)

E-Invoicing *in the future*

- › Obligation to receive e-invoicing will apply from 1st September 2026, regardless of the size of the company
- › Obligation to issue e-invoicing will become mandatory for domestic transactions between VAT liable persons established in France between September 2026 and September 2027, depending on the size of the company
- › Companies will be able to connect directly to the public portal, or via private platforms.
- › Format : CII, UBL, Factur-X (*BASIC, BASIC WL, EN 16931, EXTENDED, EXTENDED FR B2B*). Semantic format : standard EN16931

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Digital reporting *today*

No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list

Digital reporting *in the future*

- › In the same time frame as for e-invoicing, e-reporting shall take place over the public platform or through private platforms.
- › This applies for non-domestic B2B transactions, B2C transactions, and transaction payment data.
- › Companies that are not established for VAT purposes in France could be subject to this obligation, depending on the nature of the transaction.



Germany (contact: Nils Bleckmann; nils.Bleckmann@wts.de)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. eMail, EDI or ZUGFeRD acceptable)
 - › mandatory for B2G (specific format – „XRechnung“)

E-Invoicing *in the future*

- › Changes coming into force as of January 1, 2025
- › e-Invoice: default for B2B transactions when parties resident in Germany (specific VAT-exempt transactions excluded)
- › Format: generally EN 16931, parties may agree on other format (if data extraction suitable for EN 16931 requirements)
- › Staged simplifications for implementation

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list

Digital reporting *in the future*

- › Changes intended as of 2028 (intended alignment with ViDA dates)
- › Additional reporting to tax authorities:
 - › for each individual transaction
 - › besides ViDA obligations also for domestic transactions (scope of the mandatory e-Invoicing for B2B-supplies in Germany)
- › Format: not yet defined



Greece (contact: Eleni Maragou;
emaragou@accountingsolutions.gr)

E-Invoicing *today*

- › Right to choose between paper invoice and electronic invoice. Paper invoicing is practically limited to single entry books with up to 50 invoices and turnover of EUR 30 thousand annually.
- › For B2B and B2C (only upon acceptance by customer), no mandatory format; e.g. XML, PDF.
- › Among others, electronic signature and EDI qualify the authenticity of origin and integrity of content.
- › Mandatory for B2G (public contracts) with specific structure based on the European Standards. Performed only through certified e-invoicing service providers.
- › Applied gradually to all administrative bodies.

E-Invoicing *in the future*

- › Discussions with the European Commission to obtain the necessary approvals for the introduction of mandatory electronic invoicing for all B2B and B2C transactions.
- › Issuing e-invoices for B2G transactions will be mandatory to all administrative bodies as of January 2025.

Digital reporting *today*

- › Mandatory online/real time reporting of invoice data as of 01.01.2024
- › Invoices should be marked with a two-dimensional matrix (QR code) including a link for direct access to IAPR's database
- › VAT returns and corporate income tax returns are prepared by IAPR and can be modified by taxpayers
- › Reconciliations by taxpayers should be performed
- › E- invoicing service providers for B2G transaction should transmit online invoice data to IAPR

Digital reporting *in the future*

- › VAT Returns and Corporate Income Tax Returns will not be modifiable as of 01/01/2025. Currently, differences up to 5% are acceptable only for the expenses.
- › Shipping documents should be transmitted to IAPR (Pilot implementation during 2024). Mandatory obligation as of 01.04.2025.
- › Retail transactions (B2C) data issued via electronic tax mechanism would be transmitted online to IAPR (expected from March 2024)



Hungary (contact: Tamás László; tamas.laszlo@wtsklient.hu)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary (only upon acceptance by customer, no mandatory format – e.g. e-mail, EDI or other digital forwarding)
 - › Scanned invoice sent electronically also qualifies
 - › Digital archiving requirements have to be met on both sides

E-Invoicing *in the future*

- › No draft available yet with respect to e-invoicing
- › Introduction of e-receipts is planned from 2025

Digital reporting *today*

- › Online real-time invoice data reporting exists
- › Invoice data to be sent to tax authority immediately, automatically by the invoicing software, without any human intervention
- › Manual invoices to be reported within four days (or next day if VAT exceeds HUF 500,000)
- › Applies almost to all transactions, only limited exceptions
- › Cash registers have direct online connection to the tax authority

Digital reporting *in the future*

- › Since the application requirement of real-time invoice data reporting is broad, there are no plans for changes
- › Changes are expected about reporting of cash register transactions with the introduction of e-receipts from 2025



E-Invoicing *today*

- › B2B e-invoicing is not mandatory in Ireland, businesses can issue tax invoices in electronic format subject to certain conditions.
- › Ireland has chosen PEPPOL (Pan European Public Procurement Online) as the method of delivery for e-invoices to the public sector. While B2G e-invoicing in Ireland is not mandatory for businesses, in line with the European Directive 2014/55/EU, public bodies in Ireland must now be able to receive and process electronic invoices.

E-Invoicing *in the future*

On 10 October 2023, Minister McGrath announced in his Budget Day speech that Revenue would launch a Public Consultation. This Public Consultation focuses on how we can use digital advances to modernise Ireland's VAT Invoicing and Reporting System. This initial consultation covers the reform of B2B and B2G VAT reporting, supported by e-Invoicing. This Public Consultation process will run from 13 October 2023 to 31 January 2024. Revenue will analyse all responses to this Public Consultation.

Digital reporting *today*

No electronic reporting obligation of transaction data to tax authorities beside VAT registered businesses in Ireland must e-file their VAT returns via the Revenue Online Service (ROS). This e-filing requirement covers:

- › VAT return (Form VAT 3)
- › Annual Return of Trading Details (RTD)
- › Monthly/quarterly return relating to zero rated supplies for the VAT Information Exchange System (VIES/ECSL)
- › IOSS/OSS
- › Intrastat

Digital reporting *in the future*

Please see "e-invoicing in the future."



Czech Republic (contact: Kristyna Klabikova;
Kristyna.Klabikova@alferypartner.com)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › E-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format)
 - › mandatory for B2G (public entities must be able to receive and process electronic invoices in accordance with the European Standard on e-invoicing (EN-16931).)

E-Invoicing *in the future*

- › Expected changes only in connection with the introduction of ViDA. There are no planned implementations of e-invoicing requirements at the local level yet

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list

Digital reporting *in the future*

- › Expected changes only in connection with the introduction of ViDA. There are no planned implementations of digital reporting requirements at the local level yet



Italy (contact: Chiara Mejnardi; chiara.mejnardi@ra-wts.it)

E-Invoicing *today*

- › e-Invoice:
 - › mandatory for B2G, B2B and B2C transactions, with few exemptions
 - › specific format: XML (eXtensible Markup Language) format according to Italian Tax Authorities technical instructions

E-Invoicing *in the future*

- › There is no official information about the e-invoice in the future in Italy

Digital reporting *today*

- › In addition to VAT returns and EC listing/Intrastat forms relating to both sales and purchase of goods and services, each single e-invoice has to be transmitted via specific Italian Tax Authorities website/interface – i.e. Interchange System (SdI)
- › Additional reporting to tax authorities:
 - › Esterometro: electronic reporting obligation of transaction data for cross-border transactions via e-invoice format to be transmitted via SdI

Digital reporting *in the future*

- › There is no official information about digital reporting in the future in Italy



E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer)
 - › mandatory for B2G (Pan-European Public Procurement On-Line or PEPPOL invoicing specification requirements apply)

E-Invoicing *in the future*

- › As of 2025: mandatory for G2G, B2G and G2B,
- › As of 2026: mandatory for domestic merchants (B2B),
- › Exemption: for invoices issued with the help of the National Health Service system and to the transactions of state security institutions,
- › Format: in XML (Extensible Markup Language) and must comply with the PEPPOL BIS Billing 3.0 specification,
- › The timing of issuance: not yet determined,
- › Additional regulations will be introduced.

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return;
- › Obligation to submit original invoices or e-invoices during the tax review/audit performed by the Latvian tax authorities

Digital reporting *in the future*

- › As of 2026 e-invoice data will be required to be transferred to Latvian tax authorities,
- › Additional regulations will be introduced.



Lithuania (contact: Andrius Klimas;
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E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer)
 - › mandatory for B2G (using electronic portal <https://www.esaskaita.eu/>)

E-Invoicing *in the future*

- › Currently no information is available on future proposals by Lithuanian tax authorities

Digital reporting *today*

- › Obligations to digitally submit VAT invoice registers, VAT returns, and EC-sales lists.
- › Obligation to submit a digital copy of accounting data during tax review/audit by the Lithuanian tax authorities (SAF-T)

Digital reporting *in the future*

- › Currently no information is available on future proposals by Lithuanian tax authorities



Luxembourg

(contact: Ngoc-My Nguyen; Ngoc-my.Nguyen@Tiberghien.com)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. eMail or PDF acceptable)
 - › mandatory for B2G (through the use of "Peppol")

E-Invoicing *in the future*

- › No dates announced yet but at the latest as of 2028
- › Format: not yet defined

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list
- › Audit file must be provided to the VAT authorities upon request

Digital reporting *in the future*

- › No dates announced yet but at the latest as of 2028 (intended alignment with ViDA dates)
- › Format: not yet defined



E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (requires customer consent, structured format e-Invoices must comply with non-structured format –e.g. email, EDI, scanned copies of paper versions acceptable)
 - › mandatory reception in B2G context

E-Invoicing *in the future*

- › Malta transposed the e-invoicing directive in 2018 and promotes the adoption of e-Invoicing by local actors in its Digital Malta national strategy.
- › E-Invoices must be accepted by government authorities. However, there are no planned implementations of mandatory e-invoicing requirements on the local level yet.

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list

Digital reporting *in the future*

- › In the VAT context, changes are expected in connection with the eventual introduction of ViDA. There are no planned implementations of digital reporting requirements at the local level yet.



The Netherlands (contact: Johan Visser; jv@atlas.tax)

E-Invoicing *today*

- › E-Invoice:
 - › Accepted as a correct VAT invoice for all transactions. Recipient should accept the e-invoice, but is considered to do so if the invoice is processed and paid without comments, *i.e.* explicit confirmation is not required.
 - › Mandatory for B2G supplies.
 - › Definition of e-invoice: invoice that is issued and received in an electronic format. No further formal requirements are stated.

E-Invoicing *in the future*

- › No future changes announced.

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list.

Digital reporting *in the future*

- › No future changes announced.



Poland (contact: Olga Palczewska-Wielińska;
olga.palczewska@wtssaja.pl)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice (issued and received in any electronic format) voluntary for all taxable persons (only upon acceptance by customer; no mandatory format (e.g. PDF is acceptable), formal requirements must be met)
- › structured invoice issued and received through the Polish National e-Invoice System (KSeF) voluntary since January 2022 (only upon acceptance by customer, xml format being in line with a scheme published by the MoF required)

E-Invoicing *in the future*

- › The introduction of mandatory KSeF was planned for 1 July 2024. However, the implementation has been postponed to February 2026 for entities whose sales value exceeded 200 million PLN and April 2026 for others.
- › When mandatory KSeF is implemented, structured invoices (in xml format) will become a default rule for most types of transactions

Digital reporting *today*

- › EC Sales List must be submitted electronically
- › Standard Audit File for Tax (SAF-T file) in xml format, which covers VAT registers and VAT-return must be submitted electronically on a monthly basis by all taxable persons

Digital reporting *in the future*

- › No proposed changes in this area



Portugal (contact: Conceição Gamito; crg@vda.pt)

E-Invoicing *today*

- › Mandatory e-invoicing in B2G context beginning in 2021 (PT semantic data model is the standard XML format, called CIUS-PT which meets the requirements of European Norm EN 16931/2017; e-invoices must guarantee the authenticity of their origin and the integrity of their content through: (i) qualified electronic signature/seal; (ii) EDI system; (iii) other procedures that safeguard the authenticity/integrity).
- › Optional in B2B and B2C context and dependent on the acceptance of the recipient (XML or PDF format; e-invoices must guarantee the authenticity of their origin and the integrity of their content through: (i) qualified electronic signature/seal; (ii) electronic data exchange system (European EDI type Agreement; (iii) other procedures that safeguard authenticity/integrity).

E-Invoicing *in the future*

- › There is still no forecast for the transition to mandatory B2B and B2C e-invoicing

Digital reporting *today*

- › Resident and non-resident companies with a local VAT registration are required to communicate invoice and other relevant tax documents details to the Portuguese Tax Authority, regardless of their value, in one of the following three ways: (i) electronic transmission of data using a standard structured file based on the Standard Audit File for Tax (SAF-T file); (ii) transmission in real time through webservice; or direct insertion of the data in the Portuguese Tax Authority's website (option available for micro-sized business).
- › This obligation covers all transactions carried out by taxable persons irrespective of market segments (B2C, B2B or B2G) or geographic origin and destination (domestic, intra-EU or extra-EU transactions).

Digital reporting *in the future*

- › Starting in 2025, companies will also be required to submit an annual SAF-T file on accounting data which will then be used for the pre-filling of the IES (Simplified Business Information) return.
- › There is still no forecast for the transition to a real-time digital reporting that is in line with the EC's ViDA proposal.



Romania (contact: Florin Gherghel; Florin.Gherghel@ensight.ro)

E-Invoicing *today*

- › Invoices for B2B / B2G transactions with place of supply in Romania must be submitted through RO e-Factura system in a 5-day period (including by non-Romanian companies VAT registered in Romania). Otherwise, input VAT cannot be deducted and fines for non-compliance are applicable.
- › e-Invoice is generated in a specific XML format (with electronic seal of the Ministry of Finance) and sent via the private virtual space.
- › Only invoices related to specific external deliveries (e.g. exports, intra-community deliveries of goods) are exempted from being sent through e-Invoice system.

E-Invoicing *in the future*

- › Starting with 1 January 2025, entities established for VAT purposes in Romania (even if they are not registered for VAT purposes) must submit invoices for B2C transactions with place of supply in Romania through RO e-Factura system in a 5-day period.
- › E-Invoicing for B2C transactions is optional starting with 1 July 2024.

Digital reporting *today*

- › Romanian companies submit electronically 3 VAT returns (1 standard VAT return, 1 VAT return for intra-community transactions, 1 VAT return for Romanian domestic transactions) on a monthly basis (in most of cases)
- › Large and middle-sized taxpayers submit SAFT file on a monthly basis, the other taxpayers will submit SAFT file from 2025.
- › RO e-Transport system regarding the monitoring of international transport of goods is applicable starting with 01.01.2024 and the related fines applies from 01.07.2024

Digital reporting *in the future*

- › Pre-filled RO e-TVA return is implemented for operations performed starting from July 1, 2024, pre-filled RO e-TVA return being sent by the national tax authorities.
- › If significant differences are identified between pre-filled RO e-TVA return and the standard VAT return, a compliance notification is sent by the tax authorities.
- › Starting with January 1, 2025, non-compliance regarding pre-filled RO e-TVA return is subject to fines and fiscal risk status will be invoked by the tax authorities. **wtsglobal**



Serbia (contact: Željko Turudić; zeljko@wtsserbia.com)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › mandatory for B2B and for subjects of public sectors;
 - › issuing is done via SEF (System of electronic invoices);

E-Invoicing *in the future*

- › Currently extensive discussions, no changes planned

Digital reporting *today*

- › Mandatory electronic recording of VAT calculations in the SEF;
- › The majority of the VAT is recorded simultaneously with the issuance of an electronic invoice and fiscal receipt, while the remaining VAT is individually and collectively recorded in the SEF;

Digital reporting *in the future*

- › As of September, 2024, there will be a change, data about VAT from supplier invoices will be included in the SEF;
- › Companies will be required to record input VAT for which they are entitled to VAT deduction and input VAT for which they are not entitled to VAT reduction;
- › The idea is to have a preliminary VAT return for tax period in SEF;



Slovakia (Lukas Mocos, Marian Vojtek; lukas.mocos@mandat.sk;
marian.vojtek@mandat.sk)

E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. EDI, PDF acceptable)

E-Invoicing *in the future*

- › At the moment no amendments planned, there is no draft legislation at our disposal;
- › The regulations in regard with the E-invoicing, which should have been applicable since 01/01/2024 were not implemented (rules which equalize paper and digital form and rules for no need of consent of customer for receiving digital invoices...)

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return, Control Statement and EC-sales list

Digital reporting *in the future*

- › Changes intended as of 2028 (intended alignment with ViDA dates)



E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. eMail, EDI or other acceptable)
 - › mandatory for B2G (either sent via e-bank or UJPeRačun portal)

E-Invoicing *in the future*

- › Changes planned as of 1st June 2026 (Draft Act published mid-July 2024)
- › e-Invoice: default for B2B transactions (some exceptions), for B2C only with consent (and together with the visualized invoice)
- › Format: national standard e-SLOG, formats compliant with the EU e-invoicing standard (e.g. EN 16931) and other internationally established standards
- › B2B e-invoice exchange via registered e-way providers

Digital reporting *today*

- › **Invoices paid in cash are subject to fiscal verification (i.e. cash registers)**
- › No other digital reporting of transaction data (invoices)
- › The communication with the Slovenian Financial Administration is in general done electronically
- › VAT return, EC Sales List, Intrastat, Inland Recapitulative Statement (all forms) are submitted electronically

Digital reporting *in the future*

- › Changes expected with the implementation of ViDA
- › Additional reporting to tax authorities:
 - › each e-invoice must be sent to the tax authorities within 8 days of being issued/received and in the format prescribed for e-invoices (e.g. e-SLOG, EN 16931...)



Spain (contact: Miriam Vázquez;
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E-Invoicing *today*

- › Paper invoice: default rule for any type of transaction
- › e-Invoice:
 - › Voluntary for B2B and B2C (only upon acceptance by customer, no mandatory format – e.g. eMail, EDI or ZUGFeRD acceptable)
 - › Mandatory for B2G (specific format - "Facturae XML" format – Platform FACe, since 2015)

E-Invoicing in the future

- › Changes will be mandatory as of 1st July 2025 (companies with a turnover of less than €6,010,121.04), based on "Crea y Crece Law".
- › e-Invoice: default for B2B transactions when parties are residents in Spain (Spanish tax resident, or VAT tax payers)
- › Format: to ensure the interconnection and interoperability of the different invoicing systems, they will be restricted to authorized syntaxes: XML CII; UBL; EDIFACT; Facturae (used nowadays for B2G)
All invoices will contain a QR code
- › Staged simplifications for implementation

Digital reporting *today*

- › VAT return and EC-sales list
- › SII – system for keeping registry books through the Tax Authorities Electronic Headquarters (SII). It involves the electronic supply of invoicing records in a short period of time (4 days). It is compulsory for tax payers considered "large companies" (turnover over €6,010,121.04 in the previous year)

Digital reporting *in the future*

- › Changes intended as of January 2028 (intended alignment with ViDA dates)
- › Additional reporting to tax authorities:
 - › for each individual transaction
 - › besides ViDA obligations also for domestic transactions (scope of the mandatory e-Invoicing for B2B-supplies in Spain)
- › Format: not yet defined



Sweden (contact: Elias Hellman; elias.hellman@svalner.se)

E-Invoicing *today*

- › E-Invoicing is already the norm in many Swedish businesses and government agencies. However, it is not mandatory.

Digital reporting *today*

- › No electronic reporting obligation of transaction data to tax authorities besides VAT return and EC-sales list
- › VAT and EC- sales list may be reported electronically or physically, depending on the choice of the company.

E-Invoicing *in the future*

- › No further actions are expected from the Government in Sweden within the near future.

Digital reporting *in the future*

- › There are no official plans for implementation of real-time transactional reporting and the expansion of the OSS/IOSS scheme and platform economy.
- › Generally good support for digital solutions in government and in relation to reporting obligations.



Switzerland (contact: Clara Bodemann;
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E-Invoicing *today*

- › According to the practice of the Swiss Federal Tax Administration (published last year), paper invoices, electronic and digital invoices (e.g. PDF invoices or scanned paper invoices) are treated equally for VAT purposes.

E-Invoicing *in the future*

- › No future changes have yet been announced.

Digital reporting *today*

- › As of 1 January 2024, all VAT reporting (registration, submitting of VAT returns, corrections of VAT returns) must be exclusively carried out digitally on the official platform (ePortal) of the Swiss Federal Tax Administration.

Digital reporting *in the future*

- › For taxable persons who were already registered for VAT purposes in Switzerland before 1 January 2024, a one-year transitional period applies with regards to the digital reporting outlined above. The digital reporting obligation comes into force for the persons concerned on 1 January 2025.



E-Invoicing *today*

- › Suppliers to the NHS (National Health Service) have had to issue e-invoices since March 2022. There is no other requirement in effect in the UK.
- › Businesses that choose to issue e-invoices therefore do so voluntarily, and with the consent of their customers. Where used, businesses need to guarantee the integrity, authenticity, availability and legibility of these documents in the same way that they do for non-electronic invoices.

E-Invoicing *in the future*

- › The three core components of MTDfV are generally recognised as necessary enabling steps on the journey towards the creation of a digitized tax system, and so future e-invoicing is a possibility.
- › However, there are no firm plans for mandatory invoicing to be introduced in the UK at the time of writing.

Digital reporting *today*

- › There is no real time VAT reporting requirement in effect in the UK.
- › However, since April 2022, virtually all VAT-registered businesses have had to comply with the Making Tax Digital for VAT (MTDfV) program. Under these rules, businesses must keep digital records for VAT purposes, have 'digital links' in place throughout the VAT return preparation process and electronically deliver their VAT return information to HMRC.

Digital reporting *in the future*

- › Businesses operating in Northern Ireland may have to adhere to the EU's VAT in the Digital Age ("ViDA") proposals, but this has not yet been confirmed. The rest of the UK will be unaffected.
- › There are other firm plans to introduce digital reporting, beyond the requirements of MTDfV.

		e-Invoicing today		e-Invoicing in the future		Digital reporting				
	Country	Mandatory cases	Voluntary application for other cases	Mandatory cases	Voluntary application for other cases	Mandatory as of today	Format	Transactions in scope	Filing period	Via sepcific website, interface
1	Austria	Only for B2G	(with consent)	Only for B2G	(with consent)	X	X	X	X	X
2	Belgium	Only for B2G	(With consent)	As of 2026: B2G and B2B (some exceptions)	(With consent)	X	X	X	X	X
3	Bulgaria	X	(with consent)	N/A	N/A	VAT returns and VAT listings (on a transaction basis)	TXT	All (B2B, B2C, B2G)	monthly	Via the electronic service portal of the tax authorities
4	Croatia	only for B2G	(with consent)	Planned as of 2025: B2G and B2B	(with consent)	X	Depending on the type of report	All	Monthly/Quarterly	Via the electronic service portal of the tax authorities
5	Czech Republic	only for B2G	(with consent)	X	(with consent)	X	X	X	X	X
6	Denmark	Only B2G	X	Planned as of 2024: (B2G and B2B)	X	X	SAF-T Format	X	X	X
7	Finland	B2G transactions	Buyer can decide to accept only e-invoices	B2G transactions, B2B mandatory in practise	No timeline available	X	X	X	X	X
8	France	only for B2G	(with consent)	Planned as of Sep. 2026	(with consent)	Planned as of Sep. 2026	X	X	X	X
9	Germany	only for B2G	(with consent)	Planned as of 2025: B2G and B2B (some exceptions)	(with consent)	X	X	X	X	X
10	Greece	B2G with exceptions	(with consent)	Planned as of January 2025 for all B2G	X	B2B, B2C B2G	Specific Format per type of transaction.	B2B B2C B2G	Real time with invoice issuance	via "MyData" Platform (IAPRS Platform)
11	Hungary	X	(with consent)	X	(with consent)	+	XML	Most (some exceptions)	Immediately	Machine-to-machine interface / manual invoice via website
12	Ireland	No mandatory cases	Yes	X	X	X	X	X	X	X
13	Italy	for B2G, B2B, B2C, with few exemptions	X	No info	No info	for B2G, B2B, B2C, with few exemptions	XML	supply of goods, provision of services	outgoing transactions: within 12 days; incoming transactions by the 15th of the following month	Interchange System (Sdi)

		e-Invoicing today		e-Invoicing in the future		Digital reporting				
	Country	Mandatory cases	Voluntary application for other cases	Mandatory cases	Voluntary application for other cases	Mandatory as of today	Format	Transactions in scope	Filing period	Via sepcific website, interface
14	Latvia	only for B2G	(with consent)	Planned as of 2026: B2G and B2B	No further details available	X	X	X	X	X
15	Lithuania	only for B2G	(with consent)	No changes planned	No changes planned	X	X	X	X	X
16	Luxembourg	only for B2G	(with consent)	No dates set yet	(with consent)	X	X	X	X	X
17	Malta	only for B2G	(with consent)	Planned as of 2025: B2G and B2B (some exceptions)	(with consent)	X	X	X	X	X
18	Netherlands	only for B2G	(with acceptance)	No changes announced	(with acceptance)	X	X	X	X	X
19	Poland	X	(with consent)	Planned as of 2025: B2B (exception of foreign taxpayers without a FE in Poland)	X	SAF-t file	XML	VAT taxable transactions	monthly	either MoF's application or an external provider's tool
20	Portugal	Only for B2G	B2B/B2C (dependent on the acceptance of the recipient)	B2B (no forecast)	B2C (dependent on the acceptance of the recipient)	Communication of invoice and other relevant tax documents	XML	All	5th of the month following their issue	Three options available (see slide)
21	Romania	For B2B and B2G	B2C	Already implemented	No information	Yes	XML with seal of Min. of Finance	Please see slide	Monthly / Quarterly	Yes
22	Serbia	B2B and public sector	No	No information	No information					
23	Slovakia	N/A	With consent	Not yet clear – no draft legislation	Not yet clear – no draft legislation	X	X	X	X	X
24	Slovenia	only for B2G	(with consent)	Planned as of June 2026 B2G and B2B (some exceptions)	Planned as of June 2026 for individuals (with consent)	All VAT forms submitted electronically / invoices paid in cash must be sent to fiscal verification in due time	Prescribed VAT returns	VAT returns / invoices paid in cash	Within statutory deadlines / real time for invoices paid in cash	Via eDavki – system of the Slovenian Financial Administration / invoices paid in cash real time reporting
25	Spain	only for B2G	B2B – B2C (with consent)	Planned as of July 2025: B2G and B2B (some exceptions)	Others	For large companies (SII report)	X	All VAT transactions	4 working days	SII report
26	Sweden	X	X	Not yet planned	Not yet planned	X	X	X	X	X
27	Switzerland	X	Yes	X	X	Yes	X	X	X	ePortal by the Swiss Federal Tax Administration
28	United Kingdom	Only for suppliers to NHS	(with consent)	X	(with consent)	MTDFV - as of April 2022	Digital records and digital links required	All, but some manual adjustments allowed	In VAT return	MTD compliant software required for submission

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